

Hearing Date: February 25, 2010
Response Date: February 23, 2010 (extended by agreement)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re: | : | Chapter 11 Case No.: |
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| DPH HOLDINGS CORP <i>et al.</i> , | : | Case No. 05-44481 (RDD) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| | X | |

**RESPONSE OF HP ENTERPRISE SERVICES, LLC TO THE REORGANIZED
DEBTORS' FORTY-THIRD OMNIBUS OBJECTION TO CLAIMS**

HP Enterprise Services, LLC ("HP Enterprise Services") by its undersigned counsel, makes the following response to the "Reorganized Debtors' Forty-Third Omnibus Objection Pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Expunge Certain Administrative Expense (A) Severance Claims, (B) Books and Records Claims, (C) Duplicate Claims, (D) Equity Interests, (E) Prepetition Claims, (F) Insufficiently Documented Claims, (G) Pension, Benefit, and OPEB Claims, (H) Workers' Compensation Claims, and (I) Transferred Workers' Compensation Claims, (II) Modify and Allow Certain Administrative Expense Severance Claims, and (III) Allow

Certain Administrative Expense Severance Claims” (the “Forty-Third Omnibus Claims Objection”):

1. On July 9, 2009, Electronic Data Systems, an HP Company (“EDS”) filed a an administrative expense claim form in the amount of \$4,463,147.23 in connection with EDS’s claims arising after the commencement of the case but prior to July 9, 2009. This administrative expense form, assigned Claim No. 18544, was timely filed and properly supported.

2. As of January 1, 2010, EDS has been renamed HP Enterprise Services, LLC.

3. In the Forty-Third Omnibus Claims Objection, the Reorganized Debtors objected to Claim No. 18544 on the grounds that the underlying claim amount is “not owing pursuant to the Reorganized Debtors’ books and records . . . because such Administrative Claim[has] been satisfied in the ordinary course of business.”

4. The following invoices supporting Claim No. 18544 remain unpaid: U2461261, dated May 19, 2009, in the amount of \$645.52; U2475336, dated June 23, 2009, in the amount of \$800.00; and U2475337, dated June 23, 2009, in the amount of \$604.93.

5. Accordingly, HP Enterprise Services objects to the disallowance of Claim No. 18544 because a balance of \$2,050.45 remains due and owing.

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WHEREFORE, HP Enterprise Services requests that the Court overrule the Forty-Third Omnibus Claims Objection with respect to Claim No. 18544, and grant such other relief as the Court deems just and proper.

Respectfully submitted,

Dated: February 23, 2009

By: /s/ Jordan Kaye
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